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Louis.H.Garner@fakeaddress.net on 09/03/2001 10:02:49 AM

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To: EISR, Bonnie Fogdall/YM/RWDOE
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IP address: 12.73.8.19

---> Commentors Name: Louis H Garner
---> Organization: N/A
---> Position:

---> The Commentors Address:
---> 5250 S. Rainbow Blvd., Unit 2056
---> Las Vegas, Nevada 89118-0951

---> Email Information:
---> LGarner@att.net
---> Add commentor to the mailing list : yes

---> Contact Information:
---> fax number : -
---> phone number : -
---> organization : N/A
---> position :

--> Comment Text :
Louis H. Garner

5250 S. Rainbow Blvd., Unit 2056

? ? Las Vegas, NV 89118-0951 ? ?

LGarner@att.net

3 September, 2001

Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
P.O. Box 30307

North Las Vegas, NV 89036-0307

Gentlemen:

I have been a reviewer of the various incarnations of the Environmental Impact Statements for some time now and I will continue this critical review by responding to the most recent topical inputs, dated August 28, 2001.

Concerning the Yucca Mountain Preliminary Site Suitability Evaluation (PSSE), I find that the various arguments presented in the studies are structured in such a manner so as to justify the DoE's monumental expenditure of these taxpayer-funded activities without any prior authorization from those paying the bills. The designation of Yucca Mountain as the only depository, an outstanding example of the "representatives" from 49 of these United States looking for a small (only three electoral votes) and poorly represented state where they could dump their toxic waste. For all this "study" time, it has continually attempted to sell the public on the "temporary" nature of the Yucca Mountain site. I grew up in Washington, DC, and know that the so-called temporary buildings, like the old Munitions Building (on Constitution Ave. near 19th St.) was built for WWI; it was in use for more than four decades. Temporary? Very little that the government enacts is temporary (has a sunset date). It's as if Cheops built a pyr

Even if the Secretary determines that the scientific analysis indicates that Yucca Mountain is suitable, it should not be designated as the permanent repository. The depository is predicated on the usability of thousands of "carefully designed and prepared" containers of low-level and high-level radioactive material, suitable for storage for 10,000 years. First of all, the government hasn't been capable of securing hazardous material for 40 years, much less for 10,000 years. Witness the hazardous material storage at sites such as Dugway, UT, which has been leaking for years. Also, if these new containers are so hazard-free and safe, why then is it not the most practicable to bury those containers at the sites where they are produced, rather than go thru the exercises of transporting that same material across public roadways?

I believe that the Yucca Mountain site has not been sufficiently analyzed to positively ensure that it is a seismically secure location for hazardous material. In fact, there are few proposable sites west of the Rockies which would be seismically safe. Maybe a more suitable site would be the extremely large area in Central and West-Central Australia, what with it's lack of populated areas and abundance of nothing (i.e. the very outback)?

No rational organization would expend huge sums of company funds in building or "studying" an R&D project without first engaging in due diligence and detailed planning, looking at all of the viable alternatives and then opening the final guidelines/requirements to open bidding as a finalized proposal. This Yucca Mountain project is a "temporary" project in as final a form as it will ever become. It has become a monumental make work program, with initial guidelines similar to most other government programs, i.e. starting with an initial idea and then growing like Topsy, even as the program is underway, never really knowing just what they want as a final

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end-item.

Thank you for the opportunity to review these documents.

Lou Garner

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